

**Commonwealth of Kentucky**  
**Division for Air Quality**  
***RESPONSE TO COMMENTS***

ON THE Conditional Major, Operating  
Permit: F-07-010

Modine Manufacturing Company  
Harrodsburg, Kentucky 40330

March 27, 2007

Babak Fakharpour, Reviewer

SOURCE ID:	21-167-00014
SOURCE A.I. #:	3153
ACTIVITY ID:	APE20060002

**SOURCE DESCRIPTION:**

An operating permit application was received from Modine on September 18, 2006 and was complete on January 24, 2007. The applicant is a full service supplier of climate control systems, and air conditioning and heating components to the automotive, truck and off highway vehicle markets. Heat exchangers are manufactured from aluminum or copper tubes, plate fins, return bends headers or end plates and a variety of fittings and mounting brackets. Various cleaning, soldering and brazing operations are used to form the end products.

**PUBLIC AND U.S. EPA REVIEW:**

On February 22, 2007, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Harrodsburg Herald* in Harrodsburg, Kentucky. The public comment period expired 30 days from the date of publication.

**Comment received**

Comments were received from Modine on March 1, 2007. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit.

# ATTACHMENT A

## Response to Comments

The following comments from the source were submitted to the Division in a letter dated February 26, 2007.

### Permit Statement of Basis

1. Page 3 of 5, "EP 17 applies to **one** (not 2) degreasing units at source."

*Division's response: Comment acknowledged, change made.*

2. Page 3 of 5, Performance testing Requirements issues on EP 33 & 38:

"Is Modine required to do the tests on one or both (identical) thermal degreasers?"

*Division's response: Since the Thermal degreasers and the associate thermal oxidizers are identical units, Modine is required to do their performance test on one unit.*

"What parameters (tests) is Modine required to perform on these emission units?"

*Division's response: The permittee shall conduct performance tests for VOCs on the Thermal Oxidizer to determine the destruction and capture efficiency for volatile organic compounds.*

"Please define what is meant by establish the operating limits for the capture system and control device during performance testing."

*Division's response: the performance test should provides reasonable assurance of proper operation and compliance such as inlet gas temperature and gas flow rate, CO emissions and combustion gas temperature, capture and control efficiencies.*

"Why is Modine required to perform these tests (of what value are these tests)? The thermal oxidizer portion of the unit is designed to incinerate (destruct) all smoke (particulates) generated from the thermal degreaser oven. The oxidizer operating temperature (normally at 1430 deg F) can be adjusted to ensure complete combustion. Furthermore, we have already indicated that 100% of VOC content of the lubricant is assumed to be emitted as VOC in the permit application. The oil component of the lubricant will be incinerated by the unit."

*Division's response: According to the permit application, the potential to emit calculations suggest that if the thermal oxidizer is not operating then Modine will exceed the major source limit of 100 tons per year of VOC's. The performance of capture and control device will provide data on the actual measured emissions resulting in new information about the relationship between the emissions rate and monitored parameters.*

"The second thermal degreaser will not be operating under production-level loadings until October of this year-Modine therefore cannot meet the 90-day requirement for the testing of this unit. Can the permit language be changed to require testing within 90 days of permit

issuance or when the emission unit is operating under normal production levels?

*Division's response: The Division considered the request and responded by revising the subject requirements to read as follows:*

*Performance testing shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial start-up of such facility and at such other times as may be required by the cabinet.*

### **Conditional Major Permit**

3. Page 13 of 24(Draft Permit), "No. 4-Spelling for Robotic."

*Division's response: The Division has revised the permit as requested by the source.*

4. Page 11 of 24(Draft Permit), Performance testing Requirements issues on EP 33 & 38:

*Division's response: Same as comment #2 in **Permit Statement of Basis** (page 2 of 4) Division response. The testing language in the permit was edited to include the clarification.*

### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.